



## Appendix C

Excerpts from "Response to FCC 98-208 Notice of Inquiry in the matter of Revision of part 15 of the Commission's Rules Regarding Ultra Wide Band Systems," Geophysical Survey Systems, Inc., dated 7 December 1998.

*Note: bold emphasis added*

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"11B: Are there certain restricted bands where operation could be permitted, but not others? If so, which bands and what is the justification?

"Noise level operation should be permitted in all bands. See 11A.

"11C: If certain restricted bands were retained, what impact would this have on the viability of UWB technology.

"It would make time-domain systems impossible. Impulse systems such as GSSI's GPRs and the LLL technology all use impulse trains. Thus they are everywhere when viewed in the frequency domain. In fact, every transmitter ever made has energy in all bands. We just define most of its bandwidth as spurious. It is only an infinite signal which has no spurious signals. We are just asking to let our "Spurious" output be defined as spurious. The central fact is that by strictly limiting the signal in the time domain in these impulsive systems, all of the energy is spurious when viewed in the frequency domain."

"12B: Should different limits be applied to UWB systems?

"As described above, applying frequency domain limits to a time domain system is problematical at best. Allowing the UWB systems to operate at a reasonable noise level is most appropriate. It is also important to realize the very limited ranges that these devices normally operate on."